

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ZapFraud, Inc.

Plaintiff,

v.

Proofpoint, Inc.

Defendant.

Civil Action No. 19-cv-1691-MN

**JURY TRIAL DEMANDED**

**STIPULATION REGARDING FIRST AMENDED COMPLAINT**

**AND PROPOSED ORDER**

Subject to the Court's approval, Plaintiff ZapFraud, Inc. ("ZapFraud") and defendant Proofpoint, Inc. ("Proofpoint") hereby stipulate that:

1. Pursuant to Federal Rule of Civil Procedure 15(a) and in the interest of judicial efficiency, ZapFraud may bring its action by amending its original complaint and filing the First Amended Complaint attached hereto as Exhibit 1. The redline of the First Amended Complaint is attached as Exhibit 2. The First Amended Complaint shall be deemed filed and served upon the filing of this stipulation;

2. Proofpoint shall have until November 18, 2019 to respond to the First Amended Complaint.

Dated: October 16, 2019

FARNAN LLP

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Respectfully submitted,

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*Attorneys for Defendant*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
United States District Judge